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Attorneys for Defendant  
KEITH JACKSON

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

KEITH JACKSON,

Defendant.

Case No. 3:14-CR-00196 (CRB)

**DECLARATION OF SOMNATH RAJ  
CHATTERJEE IN SUPPORT OF KEITH  
JACKSON'S REPLY IN SUPPORT OF  
MOTION TO SUPPRESS FRUITS OF  
ILLEGAL WIRETAPS, OR IN THE  
ALTERNATIVE, FOR A *FRANKS*  
HEARING**

**PREVIOUSLY FILED UNDER SEAL**

1 I, SOMNATH RAJ CHATTERJEE, declare as follows:

2 1. My name is Somnath Raj Chatterjee. I am a partner with the law firm of Morrison  
3 & Foerster LLP, counsel of record for Keith Jackson in this matter and am licensed to practice  
4 before this Court and the courts of the State of California. I make this Declaration in Support of  
5 Defendant's Reply In Support Of Motion To Suppress Fruits Of Illegal Wiretaps, Or In The  
6 Alternative, For A Franks Hearing. I have personal knowledge of the facts set forth in this  
7 declaration, unless otherwise stated, and if called to testify, I could testify competently thereto.

8 2. Attached hereto as **Exhibit 29**<sup>1</sup> is a true and correct copy of the audio recording  
9 produced by the government in this matter, file name 1D066.20110525.222109.wav, that purports  
10 to be the May 25, 2011 body recording of a conversation between UCE-4599 and defendant Keith  
11 Jackson.

12 3. Various staff from my office reviewed and transcribed excerpts of audio  
13 recordings produced by the government during discovery in this matter. Attached hereto as  
14 **Exhibits 30 through 33** are uncertified transcriptions of the audio files excerpts.

15 I declare under penalty of perjury that the foregoing is true and correct. Executed this  
16 28th day of April, 2015 at San Francisco, California.

17  
18 /s/ Somnath Raj Chatterjee  
SOMNATH RAJ CHATTERJEE

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27 <sup>1</sup> The numbering sequence of exhibits continues from the Declaration of S. Raj Chatterjee  
28 In Support Of Keith Jackson's Motion To Suppress Fruits Of Illegal Wiretaps, Or In The  
Alternative For A *Franks* Hearing filed under seal on March 26, 2015.